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6 Attorney for Richard J. Chase  
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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 RICHARD J. CHASE,

14 Defendant.  
15

Case Nos. 2:18-cr-00250-JCM-NJK  
2:16-CR-171-GMN-CWH  
2:10-CR-00568-GMN-PAL

**STIPULATION TO CONTINUE**  
**SENTENCING HEARING**  
(First Request)

16 It is stipulated and agreed to by Federal Public Defender Rene L. Valladares and  
17 Assistant Federal Public Defender Sylvia A. Irvin, counsel for Richard J. Chase, and United  
18 States Attorney Dayle Elieson and Assistant United States Attorney Daniel Cowhig, counsel  
19 for the United States of America, that the Sentencing and Revocation Hearing currently  
20 scheduled on January 11, 2019, at 10:00 a.m., be vacated and continued to March 15, 2019, at  
21 10:00 a.m. or to a date and time convenient to the Court, but no sooner than sixty (60) days.

22 This Stipulation is entered into for the following reasons:

23 1. This is a joint request by counsel for the Government and counsel for the  
24 Defendant Richard J. Chase.  
25  
26

1           2.       The additional time requested by this Stipulation is reasonable pursuant to  
2 Federal Rule of Criminal Procedure 32(b)(2), which states that the “court may, for good cause,  
3 change any time limits prescribed in this rule.”

4           3.       Both counsel request this additional time in order to allow adequate time to  
5 research sentencing issues, file sentencing objections and memoranda, and to prepare for the  
6 sentencing hearing.

7           4.       The defendant is in custody and agrees with the need for the continuance.

8           5.       The parties agree to the continuance.

9           This is the first request for a continuance of the sentencing hearing.

10          DATED this 8th day of January, 2019.

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12       RENE L. VALLADARES  
13       Federal Public Defender

DAYLE ELIESON  
United States Attorney

14       By Sylvia A. Irvin  
15       SYLVIA A. IRVIN  
16       Assistant Federal Public Defender

By Daniel J. Cowhig  
DANIEL J. COWHIG  
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

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5 v.

6 RICHARD J. CHASE,

7 Defendant.

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2:16-CR-171-GMN-CWH  
2:10-CR-00568-GMN-PAL

8 **ORDER**

9  
10 IT IS ORDERED that the Sentencing and Revocation Hearing currently scheduled for  
11 Friday, January 11, 2019, at 10:00 a.m., be vacated and continued to March 15, 2019 at the  
12 hour of 10:00 a.m.

13 DATED January 9, 2019.

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15   
16 UNITED STATES DISTRICT JUDGE